

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**CHMURA ECONOMICS &
ANALYTICS, LLC,**

**Plaintiff/Counterclaim
Defendant,**

Case No. 3:19-cv-813-REP

V.

RICHARD LOMBARDO,

**Defendant/Counterclaim
Plaintiff.**

NOTICE OF FILING A MOTION TO SEAL

Plaintiff and Counterclaim Defendant Chmura Economics & Analytics, LLC (“Chmura” or “Plaintiff”), by counsel, and pursuant to Local Rule 5(C) hereby provides this Notice of Filing a Motion to Seal. As set forth in the forthcoming Motion to File Exhibits under Seal and accompanying Memorandum of Law in Support, Chmura will respectfully request that the Court permit Chmura to file under seal Exhibits 34 and 35 Plaintiff’s Memorandum of Law in Support of Its Motion for Summary Judgment. Parties and non-parties may submit memoranda of law in support of or in opposition to Plaintiff’s Motion to File Exhibits under Seal within seven (7) days. If no objection is filed within seven (7) days, the Court may treat the Motion to File Exhibits under Seal as uncontested. Chmura respectfully requests the Clerk to docket this matter in a manner that discloses its nature as a sealing motion.

Dated: May 15, 2020

/s/

Rodney A. Satterwhite (VA Bar No. 32907)
Christopher M. Michalik (VA Bar No. 47817)

Heidi E. Siegmund (VA Bar No. 89569)
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, Virginia 23219
(Office) (804) 775-1000
(Fax) (804) 698-2158
rsatterwhite@mcguirewoods.com
cmichalik@mcguirewoods.com
hsiegmund@mcguirewoods.com

Counsel for Plaintiff/Counterclaim Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of May, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send a notification of such filing (NEF) to all counsel of record.

/s/

Heidi E. Siegmund (VSB No. 89569)
McGUIREWOODS LLP
Gateway Plaza
800 East Canal Street
Richmond, VA 23219
Tel: (804) 775-1000
Fax: (804) 775-1061
hsiegmund@mcguirewoods.com

Counsel for Plaintiff/Counterclaim Defendant